



Missouri Department of Natural Resources  
Air Pollution Control Program

## INTERMEDIATE STATE PERMIT TO OPERATE

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to operate the air contaminant source(s) described below, in accordance with the laws, rules, and conditions set forth here in.

Intermediate Operating Permit Number: OP2012-029  
Expiration Date: SEP 13 2017  
Installation ID: 021-0045  
Project Number: 2011-06-081

### Installation Name and Address

Omnium  
1417 Lower Lake Road  
St. Joseph, MO 64504  
Buchanan County

### Parent Company's Name and Address

Winfield Solutions, LLC  
4001 Lexington Ave MS 2050  
Arden Hills, MN 55126

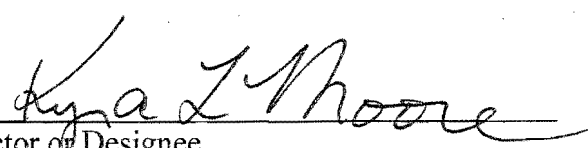
### Installation Description:

Omnium is a herbicide and pesticide manufacturing facility. Process areas at the plant that are sources of emissions include: Granular Insecticide Formulation & Packaging (P1), Liquid Formulation (P2), Herbicide Synthesis & Bagging (P4), Liquid Flowable Formulation and Shipping (P5), Liquid Formulation (P6), Wastewater Treatment (P7), Liquid Flowable Packaging (P9), Dicamba Neutralization Process (P12), and Liquid Insecticide/Spray Adjuvant Formulation and Packaging (P13).

Steam for the processes is provided by the Kansas City Power and Light-Lake Road Generating Station (021-0004).

SEP 14 2012

Effective Date

  
Director of Designee  
Department of Natural Resources

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## I. Installation Description and Equipment Listing

### INSTALLATION DESCRIPTION

Omnium is a herbicide and pesticide manufacturing facility. Process areas at the plant that are sources of emissions include: Granular Insecticide Formulation & Packaging (P1), Liquid Formulation (P2), Herbicide Synthesis & Bagging (P4), Liquid Flowable Formulation and Shipping (P5), Liquid Formulation (P6), Wastewater Treatment (P7), Liquid Flowable Packaging (P9), Dicamba Neutralization Process (P12), and Liquid Insecticide/Spray Adjuvant Formulation and Packaging (P13).

Steam for the processes is provided by the Kansas City Power and Light-Lake Road Generating Station (021-0004).

Reported Air Pollutant Emissions, tons per year						
Pollutants	2011	2010	2009	2008	2007	2006
Particulate Matter ≤ Ten Microns (PM <sub>10</sub> )	4.66	2.58	4.19	4.30	4.03	5.43
Nitrogen Oxides (NO <sub>x</sub> )	--	--	--	--	1.49	0.01
Volatile Organic Compounds(VOC)	--	--	--	--	--	0.24
Carbon Monoxide (CO)	--	--	--	--	--	0.01
Hazardous Air Pollutants (HAPs)	2.08	0.74	0.29	0.24	1.2	4.93

### EMISSION UNITS WITH LIMITATIONS

The following list provides a description of the equipment at this installation which emits air pollutants and identified as having unit-specific emission limitations.

EU0010 through EU0022 Process P1 – Granular Insecticide Formulation and Packaging Clay/Cob Carrier Unloading, Storage, & Delivery System				
Emission Unit	2010 EIQ EP	Equipment ID	Description	Capacity
EU0010	1E10	BH201-BH202	Underground Clay Unloading Belt and 96' Bucket Elevator	4.5 tons/hr
EU0011	1E10	BH245-BH246	Underground Cob Unloading Belt and 70' Bucket Elevator	
EU0012	1E7, 1E10	TV203-TV205	3 Clay Storage Silos	
EU0013	1E6, 1E10	TV206	Corn Cob Storage Silo	
EU0014	1E8, 1E10	BH206-BH209	Belt Conveyors from TV203	
EU0015	1E9, 1E10	BH247	Auger Conveyor from TV206	
EU0020	1E10	BH210	60' Bucket Elevator	
EU0021	1E10	VS211	Rotex Undersize Screen	
EU0022	1E10	TV220	Carrier Weigh Hopper	

EU0030 – EU0140 Process P1 – Granular Insecticide Formulation and Packaging Clay/Cob Carrier Impregnation and Packaging System				
Emission Unit	2010 EIQ EP	Equipment ID	Description	Capacity
EU0030	1E2	MX221	Munson Mixer	4.5 tons/hr
EU0040	1E2	VS223	Rotex Oversize Screen	
EU0050	1E2	BH222	Sesco 20 ft. Elevator	
EU0060	1E2	BH224	Sesco 27 ft. Elevator	
EU0061	1E2		Compactor	
EU0070	1E2	TV213	Bagging Hopper #1	30 to 50 lb.
EU0080	1E2	TV221	Bagging Hopper #2	6 to 20 lb.
EU0090	1E2	PE240	Bag Filler #1	30 to 50 lb.
EU0100	1E2	PE270	Bag Filler #2	6 to 20 lb.
EU0110	1E2	BH243	Reject Elevator	
EU0111	1E2		Hood	
EU0120	1E4	TV265	DMHP Storage Tank	8,000 gal
EU0130	1E5	TV266	Chloral Storage Tank	10,200 gal
EU0140	1E2	TV222, TV223	Trichlorofon Reactor, Storage	1,500 gal, 2,000 gal

EU00150 – EU0156 Process P2 – Liquid Formulation				
Emission Unit	2010 EIQ Ref	Equip ID	Description	Capacity
EU0150	2E1, 2E2	n/a	Bulk Bag Charging	1.69 tons/hr
EU0151	2E1, 2E3	n/a	Screener	
EU0152	2E1, 2E4	n/a	Bulk Bag Charging	
EU0153	2E1	TV408	Product Mix Tank (4000 gal)	
EU0154	2E1	TV800	Di-Ammonium Glyphosate Formulation Tank (6000 gal)	
EU0155	2E1	TV801	Glyphosate Formulation Tank (6000 gal)	
EU0156	2E1	TV802	Glyphosate Formulation Tank (6000 gal)	

EU0160 – EU0220 Building 15, Process P4 – Herbicide Synthesis				
Emission Unit	2010 EIQ Ref	Equipment ID	Description	Capacity
EU0160	4E1, 4E7	n/a	Herbicide Technical Powder Charge	0.6 ton/hr
EU0170	4E1, 4E8	TV760-TV762	Centrifuge Feed Tanks	
EU0180	4E1, 4E15	DR781	Product Dryer	
EU0190	4E1	ML780	Hammermill	
EU0200	4E1, 4E16	TV786	Product Storage Blender	
EU0210	4E1, 4E13	BH780-782	Conveyor System to Product Dryer	
EU0220	4E1, 4E14	BH789	Bucket Elev to Product Storage/Blender	

EU0230 – EU0250 Building 14, Process P5 Liquid Flowable Formulation and Shipping				
Emission Unit	2010 EIQ Ref	Equipment ID	Description	Capacity
EU0230	5E2, 5E3	TV117	Formulation Tank	5441 gal
EU0240	5E2, 5E3	TV118	Formulation Tank	5441 gal
EU0250	5E3	TV245	Pregel (Raw Material) Tank	4.0 tons/hr

EU0260 – EU0270 Building 13, Process P6 – Liquid Formulation				
Emission Unit	2010 EIQ Ref	Equipment ID	Description	Capacity
EU0260	6E1, 6E2		Technical Dump Station	4.0 tons/hr
EU0270	6E2	TV505	Formulation Tank	4000 gal

EU0280 – EU0330 Building 15, Process P12 – Dicamba Neutralization Process				
Emission Unit	2010 EIQ Ref	Equipment ID	Description	Capacity
EU0280	12E1, 12E5	n/a	Finished Product Conveyor and Bagging	0.07 ton/hr
EU0290	12E1	n/a	Dicamba Collection Hopper	
EU0300	12E2, 12E4	n/a	Drum Auger	
EU0310	12E2, 12E4	n/a	Tote Fill Conveyor	
EU0320	12E3, 12E4	n/a	Littleford Blender	
EU0330	12E4, 12E6	n/a	Technical Charge Tote Bag Filling	

## EMISSION UNITS WITHOUT LIMITATIONS

The following list provides a description of the equipment, which does not have unit specific limitations at the time of permit issuance.

Equipment ID	Emission Point Ref	Description of Emission Source
<b>Process P1 – Granular Insecticide Formulation and Packaging (CC81)</b>		
	1E1 and 1E3	Fugitive Emissions from Truck Unloading to Carrier Silos
TV201		Technical Day Tank (3,000 gal)
TV217		Technical Spray Weigh Tank (800 gal)
TV223	1E2	Trichlorofon Storage/Spray Tank (2,000 gal)
TV261		Premix Tech Storage Tank (10,000 gal)
<b>Process P2 – Liquid Formulation (CC82)</b>		
TV403		Mix Tank (10,000 gal)
TV405		41% Glyphosate Formulation Tank (12,000 gal)
TV409		Blend Tank (4,000 gal)
TV410		RO Water Storage Tank (4000 gal)
		Pressurized Horizontal Tank (30 psi, 60% VOC)
		2-Vertical Atmospheric Surfactant Tanks
TV820		Intermediate - 62% Storage Tank (33,700 gal)
TV821		Intermediate - 62% Storage Tank (33,700 gal)
TV822		Intermediate - Diammonium Glyphosate (30,000 gal)

TV823		Intermediate – Isoclear Storage Tank (33,700 gal)
TV824-TV825		Intermediate – Surfactant Storage Tanks (30,000 gal each)
TV840-TV841		MonoIsopropylamine 70% Tanks (40,600 gal each)
TV842-TV843		Finished Product Storage Tanks (24,000 gal each)
TV844		Aqueous Ammonia Storage (19,500 gal)
TV850-TV851		Finished Product Storage Tanks (280,000 gal each)
TV852		Finished Product Storage (110,000 gal)
<b>Process P4 – Herbicide Synthesis and Bagging (CC10)</b>		
BH787	4E17	Bagging Auger
TV711-TV712		MeSH Raw Material Storage Tanks (13,111 gal each)
TV722		25% Caustic Feed Tank (7,500 gal)
TV731		Reactor Feed Tank/Technical Slurry (8,400 gal)
TV740-TV742	4E3	3 Herbicide Synthesis Reactors (6,000 gal each)
TV743		MeSH Batch Tank (650 gal)
SF762, SF763, SF764, SF765		4 Centrifuges
<b>Process P5 – Liquid Flowable Formulation and Shipping (CC50)</b>		
TV115	5E1	9.5 Nonyl Phenol Storage Tank (5,700 gal)
TV116	5E6	Raw Material Storage Tank (5,700 gal)
TV152, TV153	5E5	2 Intermediate Process Tanks (4,862 gal each)
ML117, ML118	5E4	2 Open Head Bead Mills (60 gal each)
ML181-ML184	5E4	4 Open Head Bead Mills (60 gal each)
<b>Process P7- Wastewater Treatment</b>		
	7E1	Collection Sump
	7E3	Holding Tank
<b>Process P9 – Liquid Flowable Packaging (CC70)</b>		
TV162	9E1	Filling Line Storage/Feed Tank (11,965 gal)
TV163	9E3	Filling Line Storage/Feed Tank (11,965 gal)
TV164	9E4	Filling Line Storage/Feed Tank (11,965 gal)
	9E2	Filling Line Thiele Fillers
<b>Process P13 – Liquid Insecticide/Spray Adjuvant Formulation and Packaging (CC60)</b>		
TV157-TV158		Finished Product Storage Tanks (4,400 gal each)
TV173		Raw Material Storage Tank (12,000 gal)
TV600	13E3	Raw Material Storage Tank (7,220 gal)
TV601	13E4	Raw Material Storage Tank (9,500 gal)
TV602		Raw Material Storage Tank (9,500 gal)
TV604-TV605	13E2	Product Blend/Pack Line Feed Tanks (7,150 gal each)
TV607	13E2	Filler Head Tank (120 gal)
TV609		Product Blend Tank (10,000 gal)
TV610		Pre-mix Blend Tank (700 gal)
	13E1	Drum Fill Station
	13E5	Truck Unloading Area
TV624		Raw Material Storage Tank (11,200 gal)
TV627		Finished Product Storage Tank (20,300 gal)
TV628		Finished Product Storage Tank (20,300 gal)
TV626		Finished Product Storage Tank (25,600 gal)

## II. Plant Wide Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect on the date of permit issuance.

### PERMIT CONDITION PW001

10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)

#### **Emission Limitations:**

1. The installation shall emit less than 100.0 tons of volatile organic compounds (VOC) in any consecutive twelve-month period.
2. The installation shall emit less than 100.0 tons of particulate matter (PM<sub>10</sub>) in any consecutive twelve-month period.
3. The installation shall emit less than 10.0 tons of any individual Hazardous Air Pollutant (HAP) in any consecutive twelve-month period.
4. The installation shall emit less than 25.0 tons of combined HAPs in any consecutive twelve-month period.

#### **Monitoring/Recordkeeping:**

1. The permittee shall calculate and record facility-wide emissions of VOCs, PM<sub>10</sub>, and HAPs on a rolling twelve-month basis.
2. All records shall be maintained onsite for a minimum of five (5) years and shall be made available to Department of Natural Resources' personnel upon request.

#### **Reporting:**

The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten (10) days after any exceedance of any of the terms imposed by this regulation, or any malfunction which causes an exceedance of this regulation. Any deviations from this permit condition shall be reported in the annual compliance certification, as required by 10 CSR 10-6.065(5)(C)1.B.



### III. Emission Unit Specific Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect on the date of permit issuance.

<b>EU0010 through EU0022 Process P1 – Granular Insecticide Formulation and Packaging (CC81) Clay/Cob Carrier Unloading, Storage, &amp; Delivery System</b>				
Emission Unit	2010 EIQ EU	Equipment ID	Description	Capacity
EU0010	1E10	BH201-BH202	Underground Clay Unloading Belt and 96' Bucket Elevator	4.5 tons/hr
EU0011	1E10	BH245-BH246	Underground Cob Unloading Belt and 70' Bucket Elevator	
EU0012	1E7, 1E10	TV203-TV205	3 Clay Storage Silos	
EU0013	1E6, 1E10	TV206	Corn Cob Storage Silo	
EU0014	1E8, 1E10	BH206-BH209	Belt Conveyors from TV203	
EU0015	1E9, 1E10	BH247	Auger Conveyor from TV206	
EU0020	1E10	BH210	60' Bucket Elevator	
EU0021	1E10	VS211	Rotex Undersize Screen	
EU0022	1E10	TV220	Carrier Weigh Hopper	

<b>PERMIT CONDITION EU0010-01 through EU0022-01</b> 10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants
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**Emission Limitations:**

1. The permittee shall not cause or permit to be discharged into the atmosphere from emission units EU0010 through EU0015, EU0020, EU0021 or EU0022 any visible emissions with an opacity greater than 20 percent. [10 CSR 10-6.220\(3\)\(A\)](#)
2. The permittee may discharge into the atmosphere from any source of emissions, for a period(s) aggregating not more than six (6) minutes in any 60 minutes, air contaminants with an opacity up to 60 percent. [10 CSR 10-6.220\(3\)\(B\)](#)

**Operational Requirements:**

The control device associated with these units (baghouse SF266) shall be operating at all times when any of the associated emission units are operating.

**Monitoring/Recordkeeping/Reporting:**

See Core Permit Requirements, Section 10 CSR 10-6.220 *Restriction of Emission of Visible Air Contaminants*.

<b>EU0030 – EU0140 Process P1 – Granular Insecticide Formulation and Packaging (CC81) Clay/Cob Carrier Impregnation and Packaging System</b>				
Emission Unit	2010 EIQ EU	Equipment ID	Description	Capacity
EU0030	1E2	MX221	Munson Mixer	4.5 tons/hr
EU0040	1E2	VS223	Rotex Oversize Screen	
EU0050	1E2	BH222	Sesco 20 ft. Elevator	
EU0060	1E2	BH224	Sesco 27 ft. Elevator	
EU0061	1E2		Compactor	
EU0070	1E2	TV213	Bagging Hopper #1	30 to 50 lb.
EU0080	1E2	TV221	Bagging Hopper #2	6 to 20 lb.
EU0090	1E2	PE240	Bag Filler #1	30 to 50 lb.
EU0100	1E2	PE270	Bag Filler #2	6 to 20 lb.
EU0110	1E2	BH243	Reject Elevator	
EU0111	1E2		Hood	
EU0120	1E4	TV265	DMHP Storage Tank	8,000 gal
EU0130	1E5	TV266	Chloral Storage Tank	10,200 gal
EU0140	1E2	TV222, TV223	Trichlorofon Reactor, Storage	1,500 gal, 2,000 gal

**PERMIT CONDITION EU0030-001 through EU0111-001**

10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants

**Emission Limitations:**

1. The permittee shall not cause or permit to be discharged into the atmosphere from emission units EU0030 through EU0140, visible emissions with opacity greater than 20 percent. [10 CSR 10-6.220\(3\)\(A\)](#)
2. The permittee may discharge into the atmosphere from any source of emissions, for a period(s) aggregating not more than six (6) minutes in any 60 minutes, air contaminants with an opacity up to 60 percent. [10 CSR 10-6.220\(3\)\(B\)](#)

**Operational Requirements/Monitoring/Recordkeeping/Reporting:**

See Attachment H.

**PERMIT CONDITION EU0120-001 through EU0130-001**

10 CSR 10-6.060 Construction Permits Required

Construction Permit #0498-001, Specific Condition 1, Issued March 13, 1998

**Operational Requirements:**

The permittee shall install and use vapor recovery lines from each of the DMHP (EU0120) and Chloral (EU0130) tanks back to the tank truck unloading area so that the vapor displaced during unloading may be recovered.

**Recordkeeping:**

1. The permittee shall record the date and time of each delivery of raw material to the tanks, identify the tank that was filled, and note whether the vapor recovery lines were used (see Attachment G).
2. Attachment G contains a log including these recordkeeping requirements. This log, or an equivalent created by the permittee, must be used to certify compliance with this requirement.

- All records shall be maintained onsite for a minimum of five (5) years and shall be made available to Department of Natural Resources' personnel upon request.

**Reporting:**

The permittee shall report any deviations of this permit condition to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than the annual compliance certification, as required by 10 CSR 10-6.065(5)(C)1.B.

**PERMIT CONDITION EU0140-001**

10 CSR 10-6.060 Construction Permits Required

Construction Permit #0498-001, Specific Conditions 2 and 3, March 13, 1998

Applicability Determination, 2006-04-046, March 24, 2006

**Operational Requirements:**

The permittee shall route the vapors from the TV222 tank through an activated carbon filter (C23), and then to the existing ventilation system that contains a second carbon filter (SF251).

**Recordkeeping:**

- The permittee shall record the date and time of each transfer of material to the reactor and note whether the carbon absorber is used (see Attachment G).
- Attachment G contains a log including these recordkeeping requirements. This log, or an equivalent created by the permittee, must be used to certify compliance with this requirement.
- All records shall be maintained onsite for a minimum of five (5) years and shall be made available to Department of Natural Resources' personnel upon request.

**Reporting:**

The permittee shall report any deviations of this permit condition to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than the annual compliance certification, as required by 10 CSR 10-6.065(5)(C)1.B.

**EU00150 – EU0156 Process P2 – Liquid Formulation (CC82)**

Emission Unit	2010 EIQ EU	Equip ID	Description	Capacity
EU0150	2E1, 2E2	n/a	Bulk Bag Charging	1.69 tons/hr
EU0151	2E1, 2E3	n/a	Screener	
EU0152	2E1, 2E4	n/a	Bulk Bag Charging	
EU0153	2E1	TV408	Product Mix Tank (4000 gal)	
EU0154	2E1	TV800	Di-Ammonium Glyphosate Formulation Tank (6000 gal)	
EU0155	2E1	TV801	Glyphosate Formulation Tank (6000 gal)	
EU0156	2E1	TV802	Glyphosate Formulation Tank (6000 gal)	

**PERMIT CONDITION EU0150-01 through EU0156-01**

10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants

**Emission Limitations:**

- The permittee shall not cause or permit to be discharged into the atmosphere from emission units EU0150 through EU0156 visible emissions with an opacity greater than 20 percent. [10 CSR 10-6.220\(3\)\(A\)](#)

- The permittee may discharge into the atmosphere from any source of emissions, for a period(s) aggregating not more than six (6) minutes in any 60 minutes, air contaminants with an opacity up to 60 percent. [10 CSR 10-6.220\(3\)\(B\)](#)

**Operational Requirements:**

The control devices (wet scrubber, cartridge filter, HEPA filter, carbon absorber C3) shall be operating at all times, when any of the associated emission units are operating.

**Monitoring/Recordkeeping/Reporting:**

See Core Permit Requirements, Section 10 CSR 10-6.220 *Restriction of Emission of Visible Air Contaminants*.

EU0160 – EU0220 Building 15, Process P4 – Herbicide Synthesis (CC10)				
Emission Unit	2010 EIQ EU	Equipment ID	Description	Capacity
EU0160	4E1, 4E7	n/a	Herbicide Technical Powder Charge	0.6 ton/hr
EU0170	4E1, 4E8	TV760-TV762	Centrifuge Feed Tanks	
EU0180	4E1, 4E15	DR781	Product Dryer	
EU0190	4E1	ML780	Hammermill	
EU0200	4E1, 4E16	TV786	Product Storage Blender	
EU0210	4E1, 4E13	BH780-782	Conveyor System to Product Dryer	
EU0220	4E1, 4E14	BH789	Bucket Elev to Product Storage/Blender	

**PERMIT CONDITION EU0160-001 through EU0220-001**  
10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants

**Emission Limitations:**

- The permittee shall not cause or permit to be discharged into the atmosphere from emission units EU0160 through EU0220 visible emissions with an opacity greater than 20 percent. [10 CSR 10-6.220\(3\)\(A\)](#)
- The permittee may discharge into the atmosphere from any source of emissions, for a period(s) aggregating not more than six (6) minutes in any 60 minutes, air contaminants with an opacity up to 60 percent. [10 CSR 10-6.220\(3\)\(B\)](#)

**Operational Requirements/Monitoring/Recordkeeping/Reporting:**

See Attachment H.

<b>EU0230 – EU0250 Building 14, Process P5 Liquid Flowable Formulation and Shipping (CC50)</b>				
Emission Unit	2010 EIQ Ref	Equipment ID	Description	Capacity
EU0230	5E2, 5E3	TV117	Formulation Tank	5441 gal
EU0240	5E2, 5E3	TV118	Formulation Tank	5441 gal
EU0250	5E3	TV245	Pregel (Raw Material) Tank	4 tons/hr

**PERMIT CONDITION EU0230-001 through EU0250-001**

10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants

**Emission Limitations:**

1. The permittee shall not cause or permit to be discharged into the atmosphere from emission units EU0230, EU0240, or EU0250 visible emissions with an opacity greater than 20 percent. [10 CSR 10-6.220\(3\)\(A\)](#)
2. The permittee may discharge into the atmosphere from any source of emissions, for a period(s) aggregating not more than six (6) minutes in any 60 minutes, air contaminants with an opacity up to 60 percent. [10 CSR 10-6.220\(3\)\(B\)](#)

**Operational Requirements:**

1. The baghouse (C15) associated with these units shall be operating when solid technical material is being added to EU0230 and EU0240.
2. See Attachment H.

**Monitoring/Recordkeeping/Reporting:**

See Attachment H.

<b>EU0260 – EU0270 Building 13, Process P6 – Liquid Formulation (CC15)</b>				
Emission Unit	2010 EIQ Ref	Equipment ID	Description	Capacity
EU0260	6E1, 6E2		Technical Dump Station	4 tons/hr
EU0270	6E2	TV505	Formulation Tank	4000 gal

**PERMIT CONDITION EU0260-001 through EU0270-001**

10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants

**Emission Limitations:**

1. The permittee shall not cause or permit to be discharged into the atmosphere from emission units EU0260 and EU0270 visible emissions with an opacity greater than 20 percent. [10 CSR 10-6.220\(3\)\(A\)](#)
2. The permittee may discharge into the atmosphere from any source of emissions, for a period(s) aggregating not more than six (6) minutes in any 60 minutes, air contaminants with an opacity up to 60 percent. [10 CSR 10-6.220\(3\)\(B\)](#)

**Operational Requirements/Monitoring/Recordkeeping/Reporting:**

See Attachment H.

EU0280 – EU0330 Building 15, Process P12 – Dicamba Neutralization Process (CC03)				
Emission Unit	2010 EIQ Ref	Equipment ID	Description	Capacity
EU0280	12E1, 12E5	n/a	Finished Product Conveyor and Bagging	0.07 ton/hr
EU0290	12E1	n/a	Dicamba Collection Hopper	
EU0300	12E2, 12E4	n/a	Drum Auger	
EU0310	12E2, 12E4	n/a	Tote Fill Conveyor	
EU0320	12E3, 12E4	n/a	Littleford Blender	
EU0330	12E6, 12E4	n/a	Technical Charge Tote Bag Filling	

**PERMIT CONDITION EU0280-001 through EU0330-001**

10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants

**Emission Limitations:**

1. The permittee shall not cause or permit to be discharged into the atmosphere from emission units EU0280 through EU0330 visible emissions with an opacity greater than 20 percent. [10 CSR 10-6.220\(3\)\(A\)](#)
2. The permittee may discharge into the atmosphere from any source of emissions, for a period(s) aggregating not more than six (6) minutes in any 60 minutes, air contaminants with an opacity up to 60 percent. [10 CSR 10-6.220\(3\)\(B\)](#)

**Operational Requirements/Monitoring/Recordkeeping/Reporting:**

See Attachment H.

## IV. Core Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR), Code of State Regulations (CSR), and local ordinances for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect on the date of permit issuance. The following is only an excerpt from the regulation or code, and is provided for summary purposes only

### **10 CSR 10-6.045 Open Burning Requirements**

- 1) General Provisions. The open burning of tires, petroleum-based products, asbestos containing materials, and trade waste is prohibited, except as allowed below. Nothing in this rule may be construed as to allow open burning which causes or constitutes a public health hazard, nuisance, a hazard to vehicular or air traffic, nor which violates any other rule or statute.
- 2) Refer to the regulation for a complete list of allowances. The following is a listing of exceptions to the allowances:
  - a) Burning of household or domestic refuse. Burning of household or domestic refuse is limited to open burning on a residential premises having not more than four dwelling units, provided that the refuse originates on the same premises, with the following exceptions:
    - i) Kansas City metropolitan area. The open burning of household refuse must take place in an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of Kansas City and every contiguous municipality;
    - ii) Springfield-Greene County area. The open burning of household refuse must take place outside the corporate limits of Springfield and only within areas zoned A-1, Agricultural District;
    - iii) St. Joseph area. The open burning of household refuse must take place within an area zoned for agricultural purposes and outside that portion of the metropolitan area surrounded by the corporate limits of St. Joseph; and
    - iv) St. Louis metropolitan area. The open burning of household refuse is prohibited;
  - b) Yard waste, with the following exceptions:
    - i) Kansas City metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation shall require an open burning permit;
    - ii) Springfield-Greene County area. The City of Springfield requires an open burning permit for the open burning of trees, brush or any other type of vegetation. The City of Springfield prohibits the open burning of tree leaves;
    - iii) St. Joseph area. Within the corporate limits of St. Joseph, the open burning of trees, tree leaves, brush or any other type of vegetation grown on a residential property is allowed during the following calendar periods and time-of-day restrictions:
      - (1) A three (3)-week period within the period commencing the first day of March through April 30 and continuing for twenty-one (21) consecutive calendar days;
      - (2) A three (3)-week period within the period commencing the first day of October through November 30 and continuing for twenty-one (21) consecutive calendar days;
      - (3) The burning shall take place only between the daytime hours of 10:00 a.m. and 3:30 p.m.; and
      - (4) In each instance, the twenty-one (21)-day burning period shall be determined by the Director of Public Health and Welfare of the City of St. Joseph for the region in which the City of St. Joseph is located provided, however, the burning period first shall receive the approval of the department Director; and

- iv) St. Louis metropolitan area. The open burning of trees, tree leaves, brush or any other type of vegetation is limited to the period beginning September 16 and ending April 14 of each calendar year and limited to a total base area not to exceed sixteen (16) square feet. Any open burning shall be conducted only between the hours of 10:00 a.m. and 4:00 p.m. and is limited to areas outside of incorporated municipalities;
- 3) Certain types of materials may be open burned provided an open burning permit is obtained from the Director. The permit will specify the conditions and provisions of all open burning. The permit may be revoked if the owner or operator fails to comply with the conditions or any provisions of the permit.
- 4) Omnium may be issued an annually renewable open burning permit for open burning provided that an air curtain destructor or incinerator is utilized and only tree trunks, tree limbs, vegetation or untreated wood waste are burned. Open burning shall occur at least two hundred (200) yards from the nearest occupied structure unless the owner or operator of the occupied structure provides a written waiver of this requirement. Any waiver shall accompany the open burning permit application. The permit may be revoked if Omnium fails to comply with the provisions or any condition of the open burning permit.
  - a) In a nonattainment area, as defined in 10 CSR 10-6.020, Paragraph (2)(N)5., the Director shall not issue a permit under this section unless the owner or operator can demonstrate to the satisfaction of the Director that the emissions from the open burning of the specified material would be less than the emissions from any other waste management or disposal method.
- 5) Reporting and Recordkeeping. New Source Performance Standard (NSPS) 40 CFR Part 60 Subpart CCCC establishes certain requirements for air curtain destructors or incinerators that burn wood trade waste. These requirements are established in 40 CFR 60.2245-60.2260. The provisions of 40 CFR Part 60 Subpart CCCC promulgated as of September 22, 2005, shall apply and are hereby incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401. To comply with NSPS 40 CFR 60.2245-60.2260, sources must conduct an annual Method 9 test. A copy of the annual Method 9 test results shall be submitted to the Director.
- 6) Test Methods. The visible emissions from air pollution sources shall be evaluated as specified by 40 CFR Part 60, Appendix A–Test Methods, Method 9–Visual Determination of the Opacity of Emissions from Stationary Sources. The provisions of 40 CFR Part 60, Appendix A, Method 9 promulgated as of December 23, 1971, is incorporated by reference in this rule, as published by the U.S. Government Printing Office, 732 N Capitol Street NW, Washington, DC 20401.

<b>10 CSR 10-6.050 Start-up, Shutdown and Malfunction Conditions</b>
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- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the Director within two business days, in writing, the following information:
  - a) Name and location of installation;
  - b) Name and telephone number of person responsible for the installation;
  - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
  - d) Identity of the equipment causing the excess emissions;
  - e) Time and duration of the period of excess emissions;
  - f) Cause of the excess emissions;
  - g) Air pollutants involved;
  - h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;



- i) Measures taken to mitigate the extent and duration of the excess emissions; and
  - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the Paragraph 1 information list to the Director in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the Director shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
- 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under Section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the Paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other pertinent information available, the Director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under Section 643.080 or 643.151, RSMo.
- 4) Nothing in this rule shall be construed to limit the authority of the Director or commission to take appropriate action, under Sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
- 5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

#### **10 CSR 10-6.060 Construction Permits Required**

The permittee shall not commence construction, modification, or major modification of any installation subject to this rule, begin operation after that construction, modification, or major modification, or begin operation of any installation which has been shut down longer than five years without first obtaining a permit from the permitting authority.

#### **10 CSR 10-6.065 Operating Permits**

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. [10 CSR 10-6.065(5)(B)1.A(III)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065, §(5)(C)(1) and §(6)(C)1.C(II)] The permittee shall immediately make such permit available to any Missouri Department of Natural Resources personnel upon request. [10 CSR 10-6.065, §(5)(C)(1) and §(6)(C)3.B]

#### **10 CSR 10-6.080 Emission Standards for Hazardous Air Pollutants and 40 CFR Part 61 Subpart M National Emission Standard for Asbestos**

- 1) The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation which would be subject to provisions for 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos.

- 2) The permittee shall conduct monitoring to demonstrate compliance with registration, certification, notification, and Abatement Procedures and Practices standards as specified in 40 CFR Part 61, Subpart M.

#### **10 CSR 10-6.110 Submission of Emission Data, Emission Fees and Process Information**

- 1) The permittee shall submit full emissions report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the Director.
- 2) The permittee may be required by the Director to file additional reports.
- 3) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 4) The permittee shall submit a full EIQ for the 2011, 2014, 2017, and 2020 reporting years. In the interim years the installation may submit a Reduced Reporting Form; however, if the installation's emissions increase or decrease by more than five tons when compared to their last submitted full EIQ, the installation shall submit a full EIQ rather than a Reduced Reporting Form.
- 5) The fees shall be payable to the Department of Natural Resources and shall be accompanied by the emissions report.
- 6) The permittee shall complete required reports on state supplied EIQ forms or electronically via MoEIS. Alternate methods of reporting the emissions can be submitted for approval by the Director. The reports shall be submitted to the Director by April 1 after the end of each reporting year. If the full emissions report is filed electronically via MoEIS, this due date is extended to May 1.
- 7) The reporting period shall end on December 31 of each calendar year. Each report shall contain the required information for each emission unit for the twelve (12)-month period immediately preceding the end of the reporting period.
- 8) The permittee shall collect, record and maintain the information necessary to complete the required forms during each year of operation of the installation.

#### **10 CSR 10-6.130 Controlling Emissions During Episodes of High Air Pollution Potential**

This rule specifies the conditions that establish an air pollution alert (yellow/orange/red/purple), or emergency (maroon) and the associated procedures and emission reduction objectives for dealing with each. The permittee shall submit an appropriate emergency plan if required by the Director.

#### **10 CSR 10-6.150 Circumvention**

The permittee shall not cause or permit the installation or use of any device or any other means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission or air contaminant which violates a rule of the Missouri Air Conservation Commission.

<b>10 CSR 10-6.170 Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin</b>
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**Emission Limitation:**

- 1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven accurate and approved by the Director.
- 2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.
- 3) Should it be determined that noncompliance has occurred, the Director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
  - a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
  - b) Paving or frequent cleaning of roads, driveways and parking lots;
  - c) Application of dust-free surfaces;
  - d) Application of water; and
  - e) Planting and maintenance of vegetative ground cover.

**Monitoring:**

The permittee shall conduct inspections of its facilities sufficient to determine compliance with this regulation. If the permittee discovers a violation, the permittee shall undertake corrective action to eliminate the violation.

The permittee shall maintain the following monitoring schedule:

- 1) The permittee shall conduct monthly observations unless a violation is noted, which will require the following monitoring schedule:
  - a) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after the violation.
  - b) Should no violation of this regulation be observed during this period then-
    - i) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
    - ii) If a violation is noted, monitoring reverts to weekly.
    - iii) Should no violation of this regulation be observed during this period then-
      - (1) The permittee may observe once per month.
      - (2) If a violation is noted, monitoring reverts to weekly.
  - c) If the permittee reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner to the initial monitoring frequency in item 1a.

**Recordkeeping:**

The permittee shall document all readings on Attachment A, or its equivalent, noting the following:

- 1) Whether air emissions (except water vapor) remain visible in the ambient air beyond the property line of origin.
- 2) Whether the visible emissions were normal for the installation.

- 3) Whether equipment malfunctions contributed to an exceedance.
- 4) Any violations and any corrective actions undertaken to correct the violation.

#### **10 CSR 10-6.180 Measurement of Emissions of Air Contaminants**

- 1) The Director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The Director may specify testing methods to be used in accordance with good professional practice. The Director may observe the testing. All tests shall be performed by qualified personnel.
- 2) The Director may conduct tests of emissions of air contaminants from any source. Upon request of the Director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
- 3) The Director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

#### **10 CSR 10-6.165 Restriction of Emission of Odors**

**This requirement is not federally enforceable.**

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour.

#### **10 CSR 10-6.220 Restriction of Emission of Visible Air Contaminants**

##### **Emission Limitation:**

No owner or other person shall cause or permit to be discharged into the atmosphere from any source any visible emissions in excess of the limits specified by this rule. This permit will contain the opacity limits identified (10, 20 or 40 percent) for the specific emission units.

##### **Monitoring:**

1. The permittee shall conduct opacity readings on each emission unit using the procedures contained in U.S. EPA Test Method 22. The permittee is only required to take readings when the emission unit is operating and when the weather conditions allow. If the permittee observes no visible or other significant emissions using these procedures, then no further observations are required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.
2. The permittee shall conduct monthly observations unless a violation is noted, which will require the following monitoring schedule:
  - a) The permittee shall conduct weekly observations for a minimum of eight (8) consecutive weeks after the violation.
  - b) Should no violation of this regulation be observed during this period then-
    - i) The permittee may observe once every two (2) weeks for a period of eight (8) weeks.
    - ii) If a violation is noted, monitoring reverts to weekly.
    - iii) Should no violation of this regulation be observed during this period then-
      - (1) The permittee may observe once per month.
      - (2) If a violation is noted, monitoring reverts to weekly.

- c) If the permittee reverts to weekly monitoring at any time, monitoring frequency will progress in an identical manner to the initial monitoring frequency in item 2a.

**Recordkeeping:**

The permittee shall maintain records of all observation results using Attachments B and C (or equivalent), noting:

- 1) Whether any air emissions (except for water vapor) were visible from the emission units;
- 2) All emission units from which visible emissions occurred;
- 3) Whether the visible emissions were normal for the process;
- 4) The permittee shall maintain records of any equipment malfunctions, which may contribute to visible emissions; and,
- 5) The permittee shall maintain records of all USEPA Method 9 opacity tests performed.

<b>10 CSR 10-6.250 Asbestos Abatement Projects – Certification, Accreditation, and Business Exemption Requirements</b>
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The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the department to monitor training provided to employees. Each individual who works in asbestos abatement projects must first obtain certification for the appropriate occupation from the department. Each person who offers training for asbestos abatement occupations must first obtain accreditation from the department. Certain business entities that meet the requirements for state-approved exemption status must allow the department to monitor training classes provided to employees who perform asbestos abatement.

<b>Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone</b>
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- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
  - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
  - b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
  - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
  - d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
  - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.

- b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
- c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
- d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
- e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
- f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.
- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR Part 82, Subpart A, Production and Consumption Controls.
- 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.
- 5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR Part 82*

#### **10 CSR 10-6.280 Compliance Monitoring Usage**

- 1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
  - a) Monitoring methods outlined in 40 CFR Part 64;
  - b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
  - c) Any other monitoring methods approved by the Director.
- 2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred by a permittee:
  - a) Monitoring methods outlined in 40 CFR Part 64;
  - b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
  - c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
- 3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
  - a) Applicable monitoring or testing methods, cited in:
    - i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
    - ii) 10 CSR 10-6.040, "Reference Methods";
    - iii) 10 CSR 10-6.070, "New Source Performance Standards";

- iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
- b) Other testing, monitoring, or information gathering methods, if approved by the Director, that produce information comparable to that produced by any method listed above.

## V. General Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

### **10 CSR 10-6.065, §(5)(E)2 and §(6)(C)1.B Permit Duration**

This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed.

### **10 CSR 10-6.065, §(5)(C)1 and §(6)(C)1.C General Recordkeeping and Reporting Requirements**

- 1) Recordkeeping
  - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
  - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
  - a) All reports shall be submitted to the Air Pollution Control Program's Enforcement Section, P. O. Box 176, Jefferson City, MO 65102.
  - b) The permittee shall submit a report of all required monitoring by:
    - i) April 1st for monitoring which covers the January through December time period.
    - ii) Exception. Monitoring requirements which require reporting more frequently than annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
  - c) Each report shall identify any deviations from emission limitations, monitoring, recordkeeping, reporting, or any other requirements of the permit.
  - d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
    - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in Paragraph (6)(C)7 of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.



- ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
- iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's annual report shall be reported on the schedule specified in this permit, and no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.
- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- f) The permittee may request confidential treatment of information submitted in any report of deviation.

<b>10 CSR 10-6.065 §(5)(C)1 and §(6)(C)1.D Risk Management Plan Under Section 112(r)</b>
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The permittee shall comply with the requirements of 40 CFR Part 68, Accidental Release Prevention Requirements. If the permittee has more than a threshold quantity of a regulated substance in process, as determined by 40 CFR Section 68.115, the permittee shall submit a Risk Management Plan in accordance with 40 CFR Part 68 no later than the latest of the following dates:

- 1) June 21, 1999;
- 2) Three years after the date on which a regulated substance is first listed under 40 CFR Section 68.130; or
- 3) The date on which a regulated substance is first present above a threshold quantity in a process.

<b>10 CSR 10-6.065(5)(C)1.A General Requirements</b>
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- 1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
- 3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
- 4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted under this rule.
- 6) Failure to comply with the limitations and conditions that qualify the installation for an Intermediate permit make the installation subject to the provisions of 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit.

<b>10 CSR 10-6.065(5)(C)1.C Reasonably Anticipated Operating Scenarios</b>
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None.

<b>10 CSR 10-6.065, §(5)(B)4; §(5)(C)1, §(6)(C)3.B; and §(6)(C)3.D; and §(5)(C)3 and §(6)(C)3.E.(I) – (III) and (V) – (VI) Compliance Requirements</b>
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- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
  - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
  - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
  - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted semi-annually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
  - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
  - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102. All deviations and exceedances must be included in the compliance certifications. The compliance certification shall include the following:
  - a) The identification of each term or condition of the permit that is the basis of the certification;
  - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
  - c) Whether compliance was continuous or intermittent;
  - d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
  - e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

<b>10 CSR 10-6.065, §(5)(C)1 and §(6)(C)7 Emergency Provisions</b>
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- 1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions

limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:

- a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
  - b) That the installation was being operated properly,
  - c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
  - d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- 2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

#### **10 CSR 10-6.065(5)(C)5 Off-Permit Changes**

- 1) Except as noted below, the permittee may make any change in its permitted installation's operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Off-permit changes shall be subject to the following requirements and restrictions:
  - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is a Title I modification; Please Note: Changes at the installation which affect the emission limitation(s) classifying the installation as an intermediate source (add additional equipment to the recordkeeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
  - b) The permittee must provide written notice of the change to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101, no later than the next annual emissions report. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change; and
  - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes.

#### **10 CSR 10-6.020(2)(R)12 Responsible Official**

The application utilized in the preparation of this permit was signed by James Jay Stouppe, Director of Manufacturing. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

<b>10 CSR 10-6.065 §(5)(E)4 and §(6)(E)6.A(III)(a)-(c) Reopening-Permit for Cause</b>
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This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MDNR) or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 2) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—:
  - a) The permit has a remaining term of less than three years;
  - b) The effective date of the requirement is later than the date on which the permit is due to expire;  
or
  - c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
- 3) The Missouri Department of Natural Resources or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

<b>10 CSR 10-6.065 §(5)(E)1.A and §(6)(E)1.C Statement of Basis</b>
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This permit is accompanied by a statement setting forth the legal and factual basis for the permit conditions (including references to applicable statutory or regulatory provisions). This Statement of Basis, while referenced by the permit, is not an actual part of the permit.

## **VI. Attachments**

Attachments follow.

## Attachment A

10 CSR 10-6.170 Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin

[illegible]

## Attachment B

## 10 CSR 10-6.220, Restriction of Emission of Visible Air Contaminants

Emission Unit: \_\_\_\_\_

[illegible]

**Attachment C**  
Method 9 Opacity Emissions Observations

Company	Observer
Location	Observer Certification Date
Date	Emission Unit
Time	Control Device

Hour	Minute	Seconds				Steam Plume (check if applicable)		Comments
		0	15	30	45	Attached	Detached	
	0							
	1							
	2							
	3							
	4							
	5							
	6							
	7							
	8							
	9							
	10							
	11							
	12							
	13							
	14							
	15							
	16							
	17							
	18							

SUMMARY OF AVERAGE OPACITY				
Set Number	Time		Opacity	
	Start	End	Sum	Average

Readings ranged from \_\_\_\_\_ to \_\_\_\_\_ % opacity.

Was the emission unit in compliance at the time of evaluation? \_\_\_YES\_\_\_NO

\_\_\_\_\_  
Signature of Observer

**Attachment D**  
Malfunction and Repair Log

**Date:** \_\_\_\_\_

**Incident of Malfunction:** \_\_\_\_\_

\_\_\_\_\_

**Impact on Emissions:** \_\_\_\_\_

\_\_\_\_\_

**Duration of Event:** \_\_\_\_\_

\_\_\_\_\_

**Probable Cause:** \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**Corrective Actions:** \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_



**Attachment E**  
**Daily Baghouse/Scrubber Pressure Drop Log**

Baghouse No. \_\_\_\_\_

Normal Operating Range: \_\_\_\_\_ to \_\_\_\_\_ inches H<sub>2</sub>O

[illegible]

## Attachment F

### Inspection/Maintenance Log

[illegible]

## Attachment G

### Process Tank Filling and Reactor Charging Log

[illegible]

### Attachment H

Operational, Monitoring, Recordkeeping and Reporting Requirements for Control Devices, Using Operating Ranges, to Comply with 10 CSR 10-6.220, Restriction of Emission of Visible Air Contaminants

Required Operating Ranges for Baghouses and Scrubbers			
EQ EP	Control Device	Process Number	Pressure Drop Range (inches of water)
1E2	Baghouse – C1 (SF250)	Process P1	0.7 to 3.0
4E1	Scrubber – C12 (SC780)	Process P4	7.0 to 14.0
5E3	Baghouse – C15	Process P5	1.5 to 5.0
6E2	Baghouse – C14	Process P6	1.0 to 4.0
12E1	Baghouse – C27	Process P12	1.0 to 6.0
12E4	Scrubber – C19	Process P12	5.0 to 10.0

#### **Operational Requirements:**

1. The control device associated with these units shall be operating at all times, when any of the associated emission units are operating. This requirement excludes periods of startup, shutdown, and malfunction.
2. The control device associated with these units shall be operated within the pressure drop range in the table above, a range known by the permittee's experience to represent normal operation with essentially no visible emissions.

#### **Monitoring:**

1. Monitoring is required only when the emission unit(s) is operating.
2. The installation shall conduct daily monitoring of the pressure drop across the baghouse or scrubber to ensure that it is maintained within normal operating range.
  - a) If the pressure drop across the control device is observed to be out of the corresponding range in the table, the permittee shall immediately conduct a U.S. EPA Test Method 22 on the stack. If the stack has visible emissions perceived or believed to exceed the applicable opacity standard, the source representative shall then conduct a Method 9 observation.
  - b) The permittee shall determine the reason that the pressure drop was outside of the normal operating range and take appropriate corrective action to return the pressure drop to the range in the table.
3. The permittee shall annually conduct an opacity measurement on the control device emission point by U.S. EPA Test Method 9 with a certified Method 9 observer while the emission unit(s) is operating and within the pressure drop range in the chart above.
4. If the control device is a baghouse, the permittee shall inspect all filter bags prior to installation to ensure that all seams are properly sewn and the fabric is free from tears, cuts, or other damage.

#### **Recordkeeping:**

1. The permittee shall maintain records of all visible emission test method results (see Attachments B and C), noting whether the visible emissions were normal for the process.
2. The permittee shall maintain records of any equipment malfunctions and the action(s) taken to restore equipment to normal operation (see Attachment D).

3. The permittee shall maintain the records of daily pressure drop readings across the control device, and records of all maintenance and inspections completed on this control device (see Attachments E and F).
4. All records shall be maintained onsite for a minimum of five (5) years and shall be made available to Department of Natural Resources' personnel upon request.

**Reporting:**

The permittee shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined that the emission point exceeded the opacity limit or after any instance when the daily pressure drop reading was observed to be out of the corresponding range in the table above. Reports of any deviations from monitoring, recordkeeping and reporting requirements of this permit shall be submitted no later than the annual compliance certification, as required by 10 CSR 10-6.065(5)(C)1.B.

# STATEMENT OF BASIS

## **Voluntary Limitations**

In order to qualify for this Intermediate State Operating Permit, the permittee has accepted voluntary, federally enforceable emission limitations. Per 10 CSR 10-6.065(5)(C)1.A.(VI), if these limitations are exceeded, the installation immediately becomes subject to 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit. It is the permittee's responsibility to monitor emission levels and apply for a part 70 operating permit far enough in advance to avoid this situation. This may mean applying more than eighteen months in advance of the exceedance, since it can take that long or longer to obtain a part 70 operating permit.

## **Permit Reference Documents**

These documents were relied upon in the preparation of the operating permit. Because they are not incorporated by reference, they are not an official part of the operating permit.

- 1) Intermediate Operating Permit Application, received June 28, 2011;
- 2) 2010 Emissions Inventory Questionnaire, received March 30, 2011; and
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition.

## **Applicable Requirements Included in the Operating Permit but Not in the Application or Previous Operating Permits**

In the operating permit application, the installation indicated they were not subject to the following regulation(s). However, in the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.

None.

## **Other Air Regulations Determined Not to Apply to the Operating Permit**

The Air Pollution Control Program (APCP) has determined that the following requirements are not applicable to this installation at this time for the reasons stated.

10 CSR 10-2.320, *Control of Emissions from Production of Pesticides and Herbicides*,  
This rule applies only to sources in Clay, Jackson, and Platte Counties. This installation is located in Buchanan County.

10 CSR 10-6.100, *Alternate Emission Limits*  
This rule is not applicable because the installation is in an ozone attainment area.

10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*  
This regulation applies to any operation, process, or activity that emits particulate matter. The emission units listed in the table below emit particulate matter. The table contains data used in calculations of each emission unit's potential to emit PM and the allowable PM emission rate (calculated in accordance with 10 CSR 10-6.400(3)(A)1.) based on maximum hourly process throughput. The emission factor for filterable particulate matter, emitted during cement unloading to an elevated storage silo, was used (SCC 30501107). The results in the table demonstrate that none of these emission units can violate the emission limits calculated under this rule and are therefore the rule does not apply in accordance with 10 CSR 10-6.400(1)(B)16.

Process	Emission Units	MHDR (tons/hr)	EQ Emission Factor (lb/ton)	Particulate Matter Uncontrolled Emission Rate (lb/hr)	Emission Limit (lb/hr) <sup>1</sup>
P1	EU0010 through EU0140	4.5	0.72	3.2	11
P2	EU0150 through EU0156	1.69	0.72	1.22	5.87
P4	EU0160 through EU0220	0.6	0.72	0.4	3
P5	EU0230 through EU0250	4.0	0.72	2.9	10
P6	EU0260 through EU0270	4.0	0.72	2.9	10
P12	EU0280 through EU0330	0.07	0.72	0.05	0.7
<sup>1</sup> lbs/hr = 4.10 x (tons/hr) <sup>0.67</sup>					

### Construction Permit Revisions

The following revisions were made to construction permits for this installation:

#### *Construction Permit #0498-001*

The permittee applied for an amendment to Specific Condition 2 of this permit, that states, "Omnium shall also install and use vapor recovery lines to recover vapor while charging the reactor vessel." This amendment was requested because the reactor vapor recovery system was not functioning properly and the permittee wanted to install alternate controls. In response to this application, the Air Pollution Control Program sent a letter on May 24, 2006 (Project #2006-04-046), determining that no permit is required for change in operation. As a result, the wording of this requirement was changed to reflect alternate controls.

Specific Condition 3 states: "The permittee shall install a suitable control device between the reactor vessel and the existing air pollution control equipment for preventing emissions during the transfer of chemicals into the reactor vessel." Since an activated carbon filter has been installed as required by the amendment above, Condition 3 is not included as a requirement.

### New Source Performance Standards (NSPS) Applicability

40 CFR 60, Subpart Kb, *Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced after July 23, 1984*

This rule applies to vessels with a storage capacity greater than or equal to 75m<sup>3</sup> (19,813 gal)

constructed, reconstructed or modified after July 23, 1984. The Project Number 2010-04-058 Applicability Determination indicates that a horizontal tank pressurized to 206.8 kPa was installed for a 60 percent VOC containing material and two vertical atmospheric tanks were installed for surfactants. Subpart Kb is not applicable to the pressurized tank because of 40 CFR 60.110b(d)(2) states that the subpart does not apply to pressure vessels designed to operating in excess of 204.9 kPa and without emissions to the atmosphere. One of the surfactants does not contain VOCs. Subpart Kb is not applicable to the other surfactant tank, in accordance with 40 CFR 60.110b(b), because the surfactant has a vapor pressure less than the applicability level.

### **Maximum Achievable Control Technology (MACT) Applicability**

Subpart MMM—National Emission Standards for Hazardous Air Pollutants for Pesticide Active Ingredient Production

Source: 64 FR 33589, June 23, 1999, unless otherwise noted.

§ 63.1360 Applicability.

(a) Definition of affected source. The affected source subject to this subpart is the facility-wide collection of pesticide active ingredient manufacturing process units (PAI process units) that process, use, or produce HAP, and are located at a plant site that is a major source, as defined in Section 112(a) of the CAA. An affected source also includes waste management units, heat exchange systems, and cooling towers that are associated with the PAI process units. Exemptions from an affected source are specified in Paragraph (d) of this section.

The installation originally had submitted a notification to EPA that they would be subject to this rule. However, prior to the compliance date (June 23, 2002), the installation ceased operation associated with xylene and methylisobutylketone in process P4. The process involving these two HAPs had caused the installation to be above the major source threshold for HAPs. The 112j MACT-Part 1 Applicability Determination Request (Project #2002-05-198) states that 40 CFR Part 63, Subpart MMM is not applicable.

Subpart VVVVVV—National Emission Standards for Hazardous Air Pollutants for Chemical Manufacturing Area Sources

Source: 74 FR 56041, Oct. 29, 2009, unless otherwise noted.

Applicability and Compliance Dates

§ 63.11494 What are the applicability requirements and compliance dates?

(a) Except as specified in Paragraph (c) of this section, you are subject to this subpart if you own or operate a chemical manufacturing process unit (CMPU) that meets the conditions specified in Paragraphs (a)(1) through (3) of this section.

(1) The CMPU uses as feedstocks, generates as byproducts, or produces as products any of the hazardous air pollutants (HAP) listed in Table 1 to this subpart (Table 1 HAP).

(2) The CMPU is located at an area source of HAP emissions.

(3) Table 1 HAP are present in feedstocks, or Table 1 HAP are generated or produced in the CMPU and are present in process fluid, at concentrations greater than 0.1 percent for carcinogens, as defined by the Occupational Safety and Health Administration at 29 CFR 1910.1200(d)(4), and greater than 1.0 percent for noncarcinogens. To determine the Table 1 HAP content of feedstocks, you may rely on formulation data provided by the manufacturer or supplier, such as the Material Safety Data Sheet (MSDS) for the material. If the concentration in an MSDS is presented as a range, use the upper bound of the range.



Omnium currently does not use feedstocks, generate byproducts, or produce as products any of the hazardous air pollutants listed in Table 1 of the subpart.

### **National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability**

None

### **Other Regulatory Determinations**

Potential to emit in tons per year without controls.

CO	Total HAP	NO <sub>x</sub>	PM <sub>10</sub>	SO <sub>x</sub>	VOC	CO <sub>2e</sub>
0.3	31	0.4	82	0.0	0.4	457

*Construction Permit #0575-001, issued on May 19, 1975*

This permit authorized the construction of a triazine production facility and related control equipment and does not contain any special conditions.

*Construction Permit #0778-037, issued on July 21, 1978*

This permit authorized the construction of pesticide formulation facilities and was issued without any special conditions. These facilities were constructed to replace an older facility to be closed due to highway construction.

*Construction Permit #0878-003, issued on August 16, 1978*

This permit authorized the construction of a liquid triazine formulation plant and was issued without any special conditions.

*Construction Permit #0381-003A, issued March 16, 1981*

This permit applied to the construction of equipment associated with soybean processing, which is no longer done at this facility. No conditions in this construction permit are relevant to this installation.

*Construction Permit #0792-012, issued July 8, 1992*

This permit authorized construction of a packaging process that consisted of a feeding/densifying hopper and a polyvinyl alcohol-packaging machine. This equipment was installed but has since been removed.

*Construction Permit #1294-013, issued November 27, 1994*

This permit allowed the construction of a flare to burn gaseous ammonia, which was a waste stream of a reaction process in P4. The equipment associated with this permit is no longer operating. The special conditions of this permit no longer apply.

*Construction Permit #1196-013, issued November 5, 1996*

This permit authorized construction of herbicide manufacturing equipment. The only special condition contained in the permit is 10 CSR 10-2.070 Restriction of Emission of Odors which was rescinded November 30, 2010. No conditions from this permit are unique and need to be listed.

### **Particulate Matter (PM) Compliance Method**

The company believes that, if process baghouses and scrubbers are maintained and operated within a pressure drop range (known to correspond to the highest achievable PM control efficiency), PM emissions will be reduced to the lowest possible rate and their visible opacity will essentially be zero.

The Air Pollution Control Program agrees with this principle and has incorporated into the operating permit a method for Omnium to demonstrate compliance with the opacity emission limits (10 CSR 10-6.220). This consists of daily readings of the pressure drop across each affected baghouse and scrubber. Omnium may use pressure drop readings to demonstrate ongoing compliance with the opacity emission limits only if the pressure drop of the control devices are maintained within the range associated with optimal control efficiency (see Attachment H). The acceptable pressure drop range for each control device is also specified within the permit conditions for each emission unit that requires this monitoring.

**Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis**

Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons.

- 1) The specific pollutant regulated by that rule is not emitted by the installation.
- 2) The installation is not in the source category regulated by that rule.
- 3) The installation is not in the county or specific area that is regulated under the authority of that rule.
- 4) The installation does not contain the type of emission unit which is regulated by that rule.
- 5) The rule is only for administrative purposes.

Should a later determination conclude that the installation is subject to one or more of the regulations cited in this Statement of Basis or other regulations which were not cited, the installation shall determine and demonstrate, to the Air Pollution Control Program's satisfaction, the installation's compliance with that regulation(s). If the installation is not in compliance with a regulation which was not previously cited, the installation shall submit to the Air Pollution Control Program a schedule for achieving compliance for that regulation(s).

Prepared by:

---

Paul Kochan  
Environmental Engineer

CERTIFIED MAIL: 70093410000193530340  
RETURN RECEIPT REQUESTED

Mr. James Jay Stouppe  
Omnium  
P.O. Box 788  
St. Joseph, MO 64502

Re: Omnium, 021-0045  
Permit Number: **OP2012-029**

Dear Mr. Stouppe:

Enclosed with this letter is your intermediate operating permit. Please review this document carefully. Operation of your installation in accordance with the rules and regulations cited in this document is necessary for continued compliance. It is very important that you read and understand the requirements contained in your permit.

You may appeal this permit to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.078.16 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within thirty (30) days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If you send your appeal by registered or certified mail, we will deem it filed on the date you mailed it. If you send your appeal by a method other than registered or certified mail, we will deem it filed on the date the AHC receives it.

If you have any questions or need additional information regarding this permit, please do not hesitate to contact Paul Kochan at the Kansas City Regional Office, 500 NE Colbern Rd., Lee's Summit, MO 63125, or by telephone at (816) 622-7000. You may also contact me at the department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, or by telephone at (573) 751-4817. Thank you for your time and attention.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Michael J. Stansfield, P.E.  
Operating Permit Unit Chief

MJS/pkk

Enclosures

c: Kansas City Regional Office  
PAMS File: 2011-06-081